

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
ANA T FIGUEROA ROMAN

Alejandro Oliveras-Rivera,
Standing Chapter 13 Trustee
for the estate of
ANA T FIGUEROA ROMAN

PLAINTIFF

Vs.

Nomar Andre Torres Laboy
Ana T. Figueroa Roman
DEFENDANTS

CASE NO. 19-03969 EAG

CHAPTER 13

ADVERSARY NO. 21-00047

AVOIDANCE OF FRAUDULENT
TRANSFER UNDER SECTION 548

PLAINTIFFS' MOTION IN COMPLIANCE WITH COURT ORDER

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, Alejandro Oliveras Rivera, by and through the undersigned attorney and very respectfully, **ALLEGES, STATES and PRAYS** as follows:

1. On October 26, 2021, this Honorable Court entered a scheduling Order at docket 40, wherein in its pertinent, the Court noticed and ordered the following:

[In reviewing the record after the initial scheduling conference, the court realized that the plaintiff had filed a certificate of service showing he had sent via certified mail-return receipt requested-copy of the complaint with its exhibits and summons to debtor Ana T. Figueroa Roman and her attorney in the main chapter 13 case, Ignacio Garcia Franco. Docket number 7. Issuance and service of new summons are not necessary if the plaintiff submits to the court the signed certified mail receipts.]

4. Furthermore, in compliance with the Court Order at docket 40, the undersigned attorney hereby submits copy of the certified mail receipt in our possession which correlates with the certificate of service filed on May 10, 2021 at docket 7 and corroborates that counsel for debtor received copy of the complaint which was sent to him on April 29, 2021.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">■ Complete Items 1, 2, and 3.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Date of Delivery</p> <p>C. Is delivery address different from Item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
1. Article Addressed to: Ignacio Garcia Franco PO Box 361844 San Juan PR 361844		3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
2. Article Number (Transfer from service label) 7014 2120 0000 7488 2495		<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation® <input type="checkbox"/> Signature Confirmation Restricted Delivery	
9590 9402 5832 0034 5765 37		PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt	

USPS TRACKING#	
9590 9402 5832 0034 5765 37	
United States Postal Service	
First-Class Mail Postage & Fees Paid USPS Permit No. G-10	
* Sender: Please print your name, address, and ZIP+4® in this box*	
ALEJANDRO OLIVERAS RIVERA CHAPTER 13 TRUSTEE PO BOX 9024062 SAN JUAN, PR 00902-4062	
P. Medina #19-03969	

WHEREFORE, it is respectfully requested from this Honorable Court to be informed of the above stated, deemed the Order complied with and enter the orders it deems appropriate and necessary.

RESPECTFULLY SUBMITTED.

CERTIFICATE OF SERVICE: I hereby certify that on this same date this document has been served to debtor(s), by depositing true and correct copies thereof in the United States Mail, postage prepaid, to the non CM/ECF participants: **Defendant, Nomar A. Torres Laboy at his mailing address Urb. Villa del Carmen J-24, Calle Arecibo, Caguas, Puerto Rico 00725** and **defendant/debtor Ana T. Figueroa Roman at PO BOX 411, Guaynabo, Puerto Rico 00970**. Also, the following were sent notice through the court's CM/ECF electronic mail system: Debtor's attorney and to the Assistant United States Trustee, Monsita Lecaroz, Esq.

In San Juan, Puerto Rico, this 8th day of November 2021.

s/**ALEJANDRO OLIVERAS RIVERA**
CHAPTER 13 TRUSTEE
P.O. Box 9024062
San Juan, PR 00902-4062
Tel. 977-3500 Fax 977-3521
aorecf@ch13sju.com

By: **/s/PEDRO R. MEDINA HERNANDEZ**
PEDRO R. MEDINA HERNANDEZ
Staff Attorney
USDC-PR # 226614